EXHIBIT 1

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	Chapter 11
	§	
ALEXANDER E. JONES	§	Case No. 22-33553
	§	
Debtor.	§	
	§	

DECLARATION OF FEDERICO REYNAL IN SUPPORT OF APPLICATION OF DEBTOR FOR AN ORDER AUTHORIZING EMPLOYMENT OF THE REYNAL LAW FIRM, P.C., AS SPECIAL COUNSEL UNDER 11 U.S.C. 327(e)

- I, Federico Reynal, declare under penalty of perjury as follows:
- 1. I am an attorney at law duly admitted and in good standing to practice in the State of Texas, United States District Court for the Southern District of Texas, the United States District Court for the Western District of Texas, and the Fifth Circuit Court of Appeals. I am the founder of the Houston office of The Reynal Law Firm, P.C. (the "Firm" or "The Reynal Firm"), located at 917 Franklin, Sixth Floor, Houston, Texas 77002.
- 2. I am making this declaration in support of Debtor's Application to Employ The Reynal Firm, P.C. as Special Counsel under 11 U.S.C. § 327(e) (the "Application"). Unless otherwise indicated, capitalized terms used but not defined herein have the meanings ascribed to such terms in the Application.
- 3. Except as otherwise noted, all facts set forth in this declaration are based upon my personal knowledge, upon the client and matter records of The Reynal Firm reviewed by me or derived from information available to me that I believe to be true and correct. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

A. Scope of Services

4. Pursuant to the Engagement Agreement, the Application, and the Proposed Order attached thereto, The Reynal Firm will serve as special counsel to Debtor in connection with the Travis County Sandy Hook Lawsuits, as more particularly specified in the Engagement Letter and the Application. More specifically, the Firm shall serve as Debtor's litigation counsel on the Travis County Sandy Hook Lawsuits through the appeal, including any motions for sanctions, motions for new trial, and motions for judgment notwithstanding the verdict. During the course of the appeal, The Reynal Firm will provide services to Debtor at the direction of Debtor's appellate counsel, Martin, Disiere, Jefferson & Wisdom L.L.P., in order to save costs to the Debtor's estate.

B. Proposed Compensation

- 5. The Reynal Firm will apply to the Court for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, including §§ 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, Guidelines, and Orders for all services performed and expenses incurred during its representation of Debtor.
- 6. Subject to the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, the Guidelines, and the Orders, The Reynal Firm intends to request the allowance of its compensation as set out in the Engagement Agreement. These rates reflect the rates that The Reynal Firm ordinarily charges clients in bankruptcy and non-bankruptcy matters and are less than or equal to the rates of similarly skilled and experienced attorneys in this district. The Reynal Firm submits that these agreed terms of reimbursement, compensation, and hourly rates are reasonable. The Reynal Firm will notify Debtor of any change in the hourly rates charged for services rendered.

C. Disclosure of Connections

- i. Search and General Descriptions of Connections
- 7. The Reynal Firm performed the following actions to determine whether it or any of its attorneys has any disclosable connections, to Debtor, creditors, any other party in interest, their respective attorneys and accountants, the U.S. Trustee, any person employed in the office of the U.S. Trustee, or any of the judges for the U.S. Bankruptcy Court for the Southern District of Texas.
- 8. I conducted a search of The Reynal Firm files to determine using the list of parties in interest listed in <u>Schedule 1</u> hereto whether the Firm had any connections to or represented any of the parties listed on Schedule 1.
- 9. Except for Free Speech Systems, LLC ("<u>FSS</u>"), the search revealed that the Firm had and did not represent any of the parties listed on Schedule 1. The Firm also represents FSS and Kit Daniels, an FSS reporter, in connection with the Travis County Sandy Hook Lawsuits. Additionally, the Firm previously represented Owen Shroyer, an FSS reporter, in the Travis County Sandy Hook Lawsuits. And the firm also represented Jeffrey Shulse, a FSS employee, in an unrelated matter in the Southern District of New York. The firm's representation of Mr. Shulse in that prior matter concluded on January 24, 2022.
- 10. Furthermore, The Reynal Firm may have provided services to creditors or other parties in interest inadvertently omitted from Schedule 1 or the description above. If such connections exist, they would be on matters wholly unrelated to the service for which Debtor seeks to engage The Reynal Firm.
- 11. The results of the foregoing connections search process confirm that neither I, The Reynal Firm, nor any of its employees or partners, to the best of my knowledge, have any disqualifying connections.

- 12. Based on the connections review conducted to date and described herein, to the best of my knowledge and insofar as I can ascertain, I and The Reynal Firm do not hold an interest adverse to Debtor or the estate with respect to the matter on which the Firm is to be employed.
- 13. I am not a creditor, an equity security holder, or an insider of Debtor; I am not and was not within 2 years before the Petition Date a director of Debtor; and I do not have any interest materially adverse to the interests of Debtor's bankruptcy estate or any class of creditors or equity security holders.
- 14. The Reynal Firm is not a creditor, an equity security holder, or an insider of Debtor; The Reynal Firm is not and was not within 2 years before the Petition Date an employee, officer, or director of Debtor; and The Reynal Firm does not have any interest materially adverse to the interests of Debtor's bankruptcy estate or any class of creditors or equity security holders.
- 15. The Reynal Firm does not possess or assert any economic interest that would tend to lessen the value of the bankruptcy estate. The Reynal Firm also does not possess or assert any economic interest that would create either an actual or potential dispute in which the estate is a rival claimant. The Reynal Firm does not have any incentive to act contrary to the best interests of the estate and its creditors.

D. Bankruptcy Rule 2016(b) Disclosures

16. Pursuant to Bankruptcy Code § 504 and Bankruptcy Rule 2016, The Reynal Firm has not shared or agreed to share (a) any of its compensation from the representation of Debtor with any other persons, or (b) any compensation any other persons have received, may have received, or will receive.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

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Executed	on	February	1.	2023.
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By: /s/ F. Andino Reynal
Federico Reynal

SCHEDULE 1

TO REYNAL DECLARATION

SEARCHED PARTIES

Debtor & Professionals

Crowe & Dunlevy, P.C. Jordan & Ortiz, P.C.

BlackBriar Advisors, LLC Rachel Kennerly, LLC

Largest 20 Unsecured Creditors & Litigation Claimants

Elevated Solutions Group

Atomial LLC Cloudfare, Inc. Jacquelyn Blott Joel Skousen

eCommerce CDN LLC

Paul Watson Greenair, Inc. Edgecast, Inc.

Ready Alliance Group, Inc.

Getty Images, Inc. RatsMedical.com

David Icke Books Limited

WWCR

CustomTattoNow.com

AT&T Justin Lair Brennan Gilmore Carlee Soto-Parisi Carlos Soto

Christopher Sadowski

Dona Soto Erica Lafferty Francine Wheeler Ian Hockley Jacqueline Barden

Jennifer Hensel Jeremy Richman Jillian Soto Leonard Pozner Marcel Fontaine Mark Barden Neil Heslin

Nicole Hockley

PQPR Holdings Limited, LLC

Robert Parker Scarlett Lewis

Veronique De La Rosa William Sherlach William Aledenberg Larry Klayman

Randazza Legal Group

Additional Unsecured Creditors

Security Bank of Crawford

City of Austin
Texas Gas Service
Travis County MUD 3

Texas Disposal Systems, Inc. Netflix, Inc.

Hulu, LLC HBOMax Amazon.com, Inc.

High Gabriel Water Supply Corporation d/b/a Texas Water

Spectrum

Travis County WCID 17 Sirius XM Holdings, Inc.

AT&T, Inc. Robert Schmidt

Attorneys for Creditors and Parties in Interest

Kaster Lynch Farrar & Ball LLP Koskoff Koskoff & Bieder Zeisler & Zeisler P.C. The Akers Law Firm PLLC Waller Lansden Dortch & Davis, LLP McDowell Hetherington LLP Martin, Disiere, Jefferson & Wisdom L.L.P. Cain & Skarnulis PLLC
Chamberlain, Hrdlicka, White,
Williams & Aughtry P.C.
McCarthy & Holthus, LLP
Copycat Legal PLLC
Akin Gump Strauss Hauer & Feld
LLP
Law Offices of Ray Battaglia, PLLC

U.S. Bankruptcy Judges and Staff

Chief Judge David R. Jones Judge Marvin Isgur Judge Christopher M. Lopez Judge Jeffrey P. Norman Judge Eduardo V. Rodriguez Albert Alonzo Ana Castro Tracey Conrad Jeannie Chavez LinhThu Do Tyler Laws Kimberly Picota Vriana Portillo Mario Rios

U.S. Trustee Personnel

Alicia Barcomb
Jacqueline Boykin
Luci Johnson-Davis
Hector Duran
Barbra Griffin
Brian Henault
Linda Motton
Ha Nguyen
Glenn Otto
Yasmin Rivera

Jayson B. Ruff
Millie Sall
Patricia Schmidt
Christy Simmons
Gwen Smith
Stephen Statham
Christopher R. Travis
Clarissa Waxton
Jana Whitworth